


**SEALED**

October 02, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**BY:                     wg                      
DEPUTY**UNITED STATES OF AMERICA****Plaintiff****v.****(1) MELVIN CHARLES HILL JR  
(3) GLENN RAY MCGARITY  
    aka "G"  
(4) DIONTAY DESHAUN ROBERSON  
    aka "OAKS"  
(5) ANNEIL KALAW TEDDER  
    aka "NINA"**  
**Defendants****SA:24-CR-00178-XR****Second Superseding Indictment****COUNT 1: 18 U.S.C. § 1951(a)  
Conspiracy to Commit Hobbs Act Robbery****COUNT 2: 18 U.S.C. § 933  
Conspiracy to Traffic Firearms****COUNTS 3, 22: 18 U.S.C. § 922(g)(1)  
Felon in Possession of a Firearm****COUNTS 4, 7, 10, 13, 16, 19:  
18 U.S.C. §§ 2113(a) & (d) & 2  
Bank Robbery; Aiding and Abetting****COUNTS 5, 8, 11, 14, 17, 20:  
18 U.S.C. §§ 1951(a) & 2  
Hobbs Act Robbery; Aiding and Abetting****COUNTS 6, 9, 12, 15, 18, 21:  
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2  
Brandishing a Firearm During and in  
Relation to a Crime of Violence; Aiding and  
Abetting****THE GRAND JURY CHARGES:****INTRODUCTION**

That at all times material to this Indictment, in the Western District of Texas, Wells Fargo & Company and Bank of America Corporation were engaged in the banking business, an industry that affects interstate and foreign commerce.

That at all times material to this Indictment, in the Western District of Texas, Brink's Incorporated was engaged in the bank security services business, an industry that affects interstate

and foreign commerce.

**COUNT ONE**  
**Conspiracy to Commit Hobbs Act Robbery**  
**[18 U.S.C. § 1951(a)]**

Beginning on or about September 2023 and continuing through on or about May 7, 2024,  
in the Western District of Texas, Defendants,

**(1) MELVIN CHARLES HILL JR.,**  
**(3) GLENN RAY MCGARITY aka “G”,**  
**(4) DIONTAY DESHAUN ROBERSON aka “OAKS”,**  
**(5) ANNEIL KALAW TEDDER aka “NINA”, and**  
**[REDACTED]**

knowingly and willfully conspired and agreed together and with each other, and with others, to unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951, in that Defendants unlawfully combined, conspired, confederated, and agreed with each other, and with others, to unlawfully take and obtain property, namely United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items, in violation of Title 18, United States Code, Section 1951(a).

**Manner and Means**

It was part of the conspiracy to unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery that:

1. One or more co-conspirators would choose armored trucks to rob.
2. One or more co-conspirators would supply a vehicle, usually a stolen vehicle, to be used as the getaway vehicle.
3. One or more co-conspirators would wait near an ATM for a driver operating an armored truck to arrive at the location so that the driver could load money into the ATM.

4. Once the armored truck arrived, one or more co-conspirators would approach the armored truck driver while the driver was servicing the ATM, brandish a firearm, and take United States currency by threat of force. Meanwhile, on some occasions, a co-conspirator would remain nearby in a getaway vehicle.

5. One or more co-conspirators would then return to the getaway vehicle upon which they would flee the location with the stolen United States currency.

### **Overt Acts**

In furtherance of this conspiracy, and to effect and accomplish its objectives, one or more of the defendants committed in the Western District of Texas the overt acts alleged in Counts Five through Twenty-Three of this Indictment which are re-alleged and incorporated herein by reference.

### **COUNT TWO** **Conspiracy to Traffic Firearms** **[18 U.S.C. § 933(a)(3)]**

That from on or about September 2023 and continuing until May 7, 2024, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”, and**  
**(5) ANNEIL KALAW TEDDER aka “NINA”,**

knowingly conspired to ship, transport, transfer, cause to be transported, and otherwise dispose of any firearm to another person in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, that is, Possession of a Firearm in Furtherance of a Crime of Violence and Felon in Possession of a Firearm, in violation of Title 18, United States Code, Section 933(a)(3).

**COUNT THREE**  
**Felon in Possession of a Firearm**  
**[18 U.S.C. § 922(g)(1)]**

That on or about November 7, 2023, in the Western District of Texas, Defendant,

**(3) GLENN RAY MCGARITY aka “G”,**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, a Smith & Wesson, model M&P 5.7, 5.7x28mm caliber pistol, serial number PJW1623, and said firearm had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**  
**Bank Robbery**  
**[18 U.S.C. §§ 2113(a), 2113(d), & 2]**

That on or about November 17, 2023, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”, and**

**[REDACTED]**

aided and abetted by each other, and others, by force, violence, and intimidation, did take from the person and presence of another approximately \$80,000 in money belonging to and in the care, custody, control, management, and possession of United Services Automobile Association Federal Savings Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm, in violation of Title 18, United States Code, Sections 2113(a), 2113(d), & 2.

**COUNT FIVE**  
**Hobbs Act Robbery**  
**[18 U.S.C. §§ 1951(a) & 2]**

That on or about November 17, 2023, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”, and**  
[REDACTED]

aided and abetted by each other, and others, did knowingly and unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain the property of United Services Automobile Association Federal Savings Bank, namely, United States currency, which was then in the possession and custody of an employee of Loomis AB, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of the property, in violation of Title 18, United States Code, Sections 1951(a) & 2.

**COUNT SIX**  
**Brandishing a Firearm During and In Relation to a Crime of Violence**  
**[18 U.S.C. §§ 924(c)(1)(A)(ii) & 2]**

That on or about November 17, 2023, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”, and**  
[REDACTED]

aided and abetted by each other, and others, did knowingly brandish a firearm during and in relation to a crime of violence that may be prosecuted in a court of the United States, that is, Bank Robbery, in violation of Title 18, United States Code, Sections 2113(a) & (d), as further described in Count Four, and Hobbs Act Robbery, in violation of Title 18, United States Code, Section 1951(a), as further described in Count Five, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) & 2.

**COUNT SEVEN**  
**Bank Robbery**  
**[18 U.S.C. §§ 2113(a), 2113(d), & 2]**

That on or about December 12, 2023, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”,  
(5) ANNEIL KALAW TEDDER aka “NINA”, and**  
[REDACTED]

aided and abetted by each other, and others, by force, violence, and intimidation, did take from the person and presence of another approximately \$220,000 in money belonging to and in the care, custody, control, management, and possession of Randolph Brooks Federal Credit Union, the deposits of which were then insured by the National Credit Union Administration Board, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm, in violation of Title 18, United States Code, Sections 2113(a), 2113(d), & 2.

**COUNT EIGHT**  
**Hobbs Act Robbery**  
**[18 U.S.C. §§ 1951(a) & 2]**

That on or about December 12, 2023, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”,  
(5) ANNEIL KALAW TEDDER aka “NINA”, and**  
[REDACTED]

aided and abetted by each other, and others, did knowingly and unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain the property of Randolph Brooks Federal Credit Union, namely, United States currency, which was then in the possession and custody of an employee of Loomis AB, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of the property, in violation of Title 18, United States Code, Sections 1951(a) & 2.

**COUNT NINE**

**Brandishing a Firearm During and In Relation to a Crime of Violence  
[18 U.S.C. §§ 924(c)(1)(A)(ii) & 2]**

That on or about December 12, 2023, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”, and**  
[REDACTED]

aided and abetted by each other, and others, did knowingly brandish a firearm during and in relation to a crime of violence that may be prosecuted in a court of the United States, that is, Bank Robbery, in violation of Title 18, United States Code, Sections 2113(a) & (d), as further described in Count Seven, and Hobbs Act Robbery, in violation of Title 18, United States Code, Section 1951(a), as further described in Count Eight, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) & 2.

**COUNT TEN**

**Bank Robbery  
[18 U.S.C. §§ 2113(a), 2113(d), & 2]**

That on or about January 31, 2024, in the Western District of Texas, Defendants,

**(1) MELVIN CHARLES HILL JR.,  
(3) GLENN RAY MCGARITY aka “G”,  
(5) ANNEIL KALAW TEDDER aka “NINA”, and**  
[REDACTED]

aided and abetted by each other, by force, violence, and intimidation, did take from the person and presence of another approximately \$166,000 in money belonging to and in the care, custody, control, management, and possession of JPMorgan Chase Bank, N.A., the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm, in violation of Title 18, United States Code, Sections 2113(a), 2113(d), & 2.

**COUNT ELEVEN**  
**Hobbs Act Robbery**  
**[18 U.S.C. §§ 1951(a) & 2]**

That on or about January 31, 2024, in the Western District of Texas, Defendants,

**(1) MELVIN CHARLES HILL JR.,**  
**(3) GLENN RAY MCGARITY aka “G”,**  
**(5) ANNEIL KALAW TEDDER aka “NINA”, and**  
**[REDACTED]**

aided and abetted by each other, did knowingly and unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain the property of JPMorgan Chase Bank, N.A., namely, United States currency, which was then in the possession and custody of an employee of Brink’s Incorporated, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of the property, in violation of Title 18, United States Code, Sections 1951(a) & 2.

**COUNT TWELVE**  
**Brandishing a Firearm During and In Relation to a Crime of Violence**  
**[18 U.S.C. §§ 924(c)(1)(A)(ii) & 2]**

That on or about January 31, 2024, in the Western District of Texas, Defendants,

**(1) MELVIN CHARLES HILL JR.,**  
**(3) GLENN RAY MCGARITY aka “G”, and**  
**[REDACTED]**

aided and abetted by each other, did knowingly brandish a firearm during and in relation to a crime of violence that may be prosecuted in a court of the United States, that is, Bank Robbery, in violation of Title 18, United States Code, Sections 2113(a) & (d), as further described in Count Ten, and Hobbs Act Robbery, in violation of Title 18, United States Code, Section 1951(a), as further described in Count Eleven, in violation of Title 18, United States Code, Sections



924(c)(1)(A)(ii) & 2.

**COUNT THIRTEEN**  
**Bank Robbery**  
**[18 U.S.C. §§ 2113(a), 2113(d), & 2]**

That on or about March 13, 2024, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”, and**  
**[REDACTED]**

aided and abetted by each other, and others, by force, violence, and intimidation, did take from the person and presence of another approximately \$132,000 in money belonging to and in the care, custody, control, management, and possession of Randolph Brooks Federal Credit Union, the deposits of which were then insured by the National Credit Union Administration Board, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm, in violation of Title 18, United States Code, Sections 2113(a), 2113(d), & 2.

**COUNT FOURTEEN**  
**Hobbs Act Robbery**  
**[18 U.S.C. §§ 1951(a) & 2]**

That on or about March 13, 2024, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”, and**  
**[REDACTED]**

aided and abetted by each other, and others, did knowingly and unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain the property of Randolph Brooks Federal Credit Union, namely, United States currency, which was then in the possession and custody of an employee of Loomis AB, by means of actual and threatened force, violence, and fear of injury to those in lawful

possession of the property, in violation of Title 18, United States Code, Sections 1951(a) & 2.

**COUNT FIFTEEN**  
**Brandishing a Firearm During and In Relation to a Crime of Violence**  
**[18 U.S.C. §§ 924(c)(1)(A)(ii) & 2]**

That on or about March 13, 2024, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”, and**  
**[REDACTED]**

aided and abetted by each other, and others, did knowingly brandish a firearm during and in relation to a crime of violence that may be prosecuted in a court of the United States, that is, Bank Robbery, in violation of Title 18, United States Code, Sections 2113(a) & (d), as further described in Count Thirteen, and Hobbs Act Robbery, in violation of Title 18, United States Code, Section 1951(a), as further described in Count Fourteen, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) & 2.

**COUNT SIXTEEN**  
**Bank Robbery**  
**[18 U.S.C. §§ 2113(a), 2113(d), & 2]**

That on or about March 20, 2024, in the Western District of Texas, Defendant,

**(1) MELVIN CHARLES HILL JR.,**

aided and abetted by others, by force, violence, and intimidation, did take from the person and presence of another approximately \$120,000 in money belonging to and in the care, custody, control, management, and possession of Wells Fargo & Company, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm, in violation of Title 18, United States Code, Sections 2113(a), 2113(d), & 2.

**COUNT SEVENTEEN**  
**Hobbs Act Robbery**  
**[18 U.S.C. §§ 1951(a) & 2]**

That on or about March 20, 2024, in the Western District of Texas, Defendant,

**(1) MELVIN CHARLES HILL JR.,**

aided and abetted by others, did knowingly and unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain the property of Wells Fargo & Company, namely, United States currency, which was then in the possession and custody of an employee of Brink’s Incorporated, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of the property, in violation of Title 18, United States Code, Sections 1951(a) & 2.

**COUNT EIGHTEEN**  
**Brandishing a Firearm During and In Relation to a Crime of Violence**  
**[18 U.S.C. § 924(c)(1)(A)(ii)]**

That on or about March 20, 2024, in the Western District of Texas, Defendant,

**(1) MELVIN CHARLES HILL JR.,**

did knowingly brandish a firearm during and in relation to a crime of violence that may be prosecuted in a court of the United States, that is, Bank Robbery, in violation of Title 18, United States Code, Sections 2113(a) & (d), as further described in Count Sixteen, and Hobbs Act Robbery, in violation of Title 18, United States Code, Section 1951(a), as further described in Count Seventeen, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii).

**COUNT NINETEEN**  
**Bank Robbery**  
**[18 U.S.C. §§ 2113(a), 2113(d), & 2]**

That on or about May 7, 2024, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”,**  
**(4) DIONTAY DESHAUN ROBERSON aka “OAKS”, and**  
**(5) ANNEIL KALAW TEDDER aka “NINA”,**

aided and abetted by each other, by force, violence, and intimidation, did take from the person and presence of another approximately \$154,000 in money belonging to and in the care, custody, control, management, and possession of Bank of America Corporation, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm, in violation of Title 18, United States Code, Sections 2113(a), 2113(d), & 2.

**COUNT TWENTY**  
**Hobbs Act Robbery**  
**[18 U.S.C. §§ 1951(a) & 2]**

That on or about May 7, 2024, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”,**  
**(4) DIONTAY DESHAUN ROBERSON aka “OAKS”, and**  
**(5) ANNEIL KALAW TEDDER aka “NINA”,**

aided and abetted by each other, did knowingly and unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain the property of Bank of America Corporation, namely, United States currency, which was then in the possession and custody of an employee of Brink’s Incorporated, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of the property, in violation of Title 18, United States Code, Sections 1951(a) &

2.

**COUNT TWENTY-ONE**  
**Brandishing a Firearm During and In Relation to a Crime of Violence**  
**[18 U.S.C. §§ 924(c)(1)(A)(ii) & 18 U.S.C. § 2]**

That on or about May 7, 2024, in the Western District of Texas, Defendants,

**(3) GLENN RAY MCGARITY aka “G”, and**  
**(4) DIONTAY DESHAUN ROBERSON aka “OAKS”,**

aided and abetted by each other, did knowingly brandish a firearm during and in relation to a crime of violence that may be prosecuted in a court of the United States, that is, Bank Robbery, in violation of Title 18, United States Code, Sections 2113(a) & (d), as further described in Count Nineteen, and Hobbs Act Robbery, in violation of Title 18, United States Code, Section 1951(a), as further described in Count Twenty, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii), and that **(4) DIONTAY DESHAUN ROBERSON aka “OAKS”** committed this offense after a prior conviction under Title 18, United States Code, Section 924(c) had become final, in violation of Title 18, United States Code, Section 924(c)(1)(C)(i).

**COUNT TWENTY-TWO**  
**Felon in Possession of a Firearm**  
**[18 U.S.C. § 922(g)(1)]**

That on or about May 8, 2024, in the Western District of Texas, Defendant,

**(4) DIONTAY DESHAUN ROBERSON aka “OAKS”,**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, a Glock, model 43x, 9x19mm caliber pistol, serial number AKAL663, and said firearm had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**NOTICE OF UNITED STATES OF AMERICA’S DEMAND FOR FORFEITURE**  
**[See Fed. R. Crim. P. 32.2]**

**I.**

**Bank Robbery Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 2113(a) and (d), and 1951(a), subject to forfeiture pursuant to Title 18 U.S.C. §§ 981(a)(1)(C) and 924, made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the criminal violations set forth in Counts One, Five, Six, Eight, Nine, Eleven, Twelve, Fourteen, Fifteen, Seventeen, Eighteen, Twenty, and Twenty-One, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. §§ 981(a)(1)(C) and 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

**Title 18 U.S.C. § 981. Civil forfeiture**

**(a)(1)** The following property is subject to forfeiture to the United States:

**(C)** Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting “specified unlawful activity” (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

Bank Robbery violations are offenses constituting “specified unlawful activity” as defined in Title 18 U.S.C. § 1956(c)(7).

**Title 18 U.S.C. § 924. Penalties**

**(d)(I)** Any firearm or ammunition involved in or used in . . . violation of any other criminal law of the United States. . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . .

**II.**

**Firearm Violation and Forfeiture Statutes**

**[Title 18 U.S.C. § 933(a)(3) subject to forfeiture pursuant to Title 18 U.S.C. § 934(a)(1)(A) and (B)]**

As a result of the criminal violation set forth in Count Two, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

**Title 18 U.S.C. § 934. Forfeiture and Fines.**

**(a) Forfeiture. --**

**(1) In general. --** Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

- (A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and
- (B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

**III.**

**Firearm Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 922(g)(1), 924(c)(1)(A)(ii), and 933(a)(3), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the criminal violations set forth in Counts Two, Three, Six, Nine, Twelve, Fifteen, Eighteen, Twenty-One and Twenty-Two, the United States of America gives notice to the Defendant **(3) GLENN RAY MCGARITY** of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

**Title 18 U.S.C. § 924. Penalties**

**(d)(I)** Any firearm or ammunition involved in or used in any knowing violation of subsection...g...of section 922. . . or knowing violation of section 924 ...or 933. . .shall be subject to seizure and forfeiture. . . under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the following:

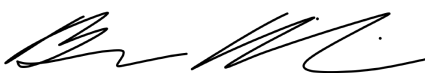
1. Smith & Wesson, Model: M&P 5.7, 5.7x 28mm caliber handgun, serial number PJW1623 seized from Glenn Ray McGarity; and
2. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

A TRUE BILL

[REDACTED]  
FOREPERSON OF THE GRAND JURY

JAIME ESPARZA  
UNITED STATES ATTORNEY

BY:



BRIAN NOWINSKI  
Assistant United States Attorney